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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

JESTER JACOB, as an individual and on
behalf of aggrieved employees,

Plaintiff,

vs.

WESTERN DIGITAL TECHNOLOGIES,
INC., a Delaware corporation;
EMPLOYNET, INC., a California
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 22CV394446

(Assigned to the Hon. Beth McGowen, Dept. 22)

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S MOTION TO APPROVE
SETTLEMENT AGREEMENT PURSUANT
TO THE PRIVATE ATTORNEYS GENERAL
ACT AND JUDGMENT THEREON**

Date: August 6, 2026

Time: 1:30 P.M.

Dept.: 22

Action Filed: February 17, 2022

1 **[PROPOSED] ORDER AND JUDGMENT**

2 Plaintiff Jester Jacob's ("Plaintiff") Motion to Approve Settlement Agreement Pursuant
3 to the Private Attorneys General Act came on regularly for hearing on August 6, 2026.
4 Appearances for Plaintiff and Defendants Western Digital Technologies, Inc. and Employnet,
5 Inc. (together, "Defendants") (Plaintiff and Defendants collectively, the "Parties") were noted on
6 the record.

7 The Court has considered the Joint Stipulation of PAGA Settlement and Release of
8 Claims ("Settlement Agreement") and all other papers filed in this action.

9 **NOW THEREFORE, IT IS HEREBY ORDERED AS FOLLOWS:**

10 1. Pursuant to California Labor Code section 2699(l), Plaintiff's Motion is
11 **GRANTED.** The Court finds that the Settlement is in all respects adequate considering the
12 purposes and provisions of the California Labor Code Private Attorneys General Act, California
13 Labor Code section 2698, *et seq.* The Court finds that the Settlement has been reached as a result
14 of informed and non-collusive arm's-length negotiations. The Court further finds that the Parties
15 were able to reasonably evaluate their respective positions. The Court has reviewed the monetary
16 recovery being provided by the Settlement and recognizes the value accorded to the State of
17 California and aggrieved employees.

18 2. Pursuant to Labor Code section 2699(i), the Gross Settlement Amount of Three
19 Hundred Fifty Thousand Dollars (\$350,000.00) shall be distributed as follows:

- 20 a. Seventy-five percent (75%) of the PAGA Penalties to the LWDA.
21 b. Twenty-five percent (25%) of the PAGA Penalties to the Aggrieved
22 Employees.
23 c. One Hundred Sixteen Thousand Six Hundred Sixty-Six Dollars and Sixty-
24 Seven Cents (\$116,666.67) to Plaintiff's counsel as the PAGA Counsel Fees Payment;
25 d. Twenty-Four Thousand Thirty-Two Dollars and Sixty-Two Cents
26 (\$24,032.62) to Plaintiff's counsel as the PAGA Counsel Litigation Expenses Payment;
27 e. Ten Thousand Dollars (\$10,000.00) to Plaintiff as a service award; and
28 f. Ten Thousand Dollars (\$10,000.00) to the Settlement Administrator.

1 3. Upon full funding of the Gross Settlement Amount, Plaintiff and all Aggrieved
2 Employees shall be deemed to have fully, finally, and forever waived the Released Parties from
3 the Released PAGA Claims.

4 4. The Parties are ordered to carry out the terms of the settlement in accordance with
5 the terms of the Settlement Agreement.

6 5. Judgment is hereby entered in accordance with this Order and the terms of the
7 Settlement. Plaintiff shall take from his complaint only the relief set forth in the Settlement
8 Agreement and this Order and Judgment. Without affecting the finality of the Settlement or this
9 Judgment in any way, the Court shall retain jurisdiction over the Parties for purposes of
10 enforcing and interpreting the Settlement, this Order, and this Judgment.

11 6. The Settlement does not constitute an admission by Defendants of liability to
12 Plaintiff or any Aggrieved Employee, nor does this Order constitute a finding by the Court of the
13 validity of any of the claims alleged in this Action, or any liability of Defendants or any of the
14 Released Parties.

15 **IT IS SO ORDERED.**

16
17 DATED: _____

HONORABLE BETH MCGOWAN
SUPERIOR COURT OF CALIFORNIA